REMARKS

The rejection of claims 1-10 under 35 USC §102(e) in view of U.S. Patent Publication No. 2004/0123302 (Lo) is respectfully traversed on the grounds that the Lo publication fails to disclose or suggest management of network devices over the web, in which the network devices are accessed by a database management module that enables the operator to **hyperlink** to web pages associated with each of the devices, as now recited in claim 1, thereby eliminating the need for local storage and updating of the IP addresses of each of the network devices. Support for the amendment to claim 1 is found, for example, in lines 20 *et seq.* on page 2 of the original specification.

According to the invention, management of network devices is carried out by enabling the operator to simply hyperlink to each of the network devices. Web agents in the network devices provide status data to the network manager via HTTP packets, which then displays the status information on the display of the workstation. In contrast, the Lo publication discloses an "application programmable interface" (API) that enables "enterprise resource planning" (ERP) devices to communicate across the web, and in particular a set of pre-define API calls that enables web users to request information from ERP software via HTML input forms, which request is then used to create a sequence of ERP API calls for execution by the ERP software. The results of the ERP software are themselves transformed into HTML or XML/XSL format for presentation to the Web user.

The HTML forms of Lo do <u>not</u> correspond to the claimed HTML files containing hyperlinks to network devices. <u>Whereas the claimed invention simplifies network management by replacing the conventional database of IP addresses of managed devices with an HTML file containing hyperlinks, Lo essentially seeks to permit ERP devices to communicate over the web using an appropriate ERP to web-protocol interface</u>. The resulting protocols are fundamentally different, as evidenced by the following side-side-side comparison of methods:

Claimed	The Lo Publication
• communicate between network devices and manager modules of a workstation using a web browser, by enabling the operator to **hyperlink** to web pages associated with the network devices	• transmit an HTML input form to a browser for display on a monitor; • receive an HTTP request from the browser to access the ERP system, the request optionally including data entered by the user into the HTML form; • transferring data in the input form and data stored in the requested HTML page into the API of an ERP application; • transfer control to the ERP application for execution; • receive output data from the ERP application; • merge the output data from the ERP application into a strongly typed Java object; • transform the strongly typed Java objects into a transmittable format, such as XML or HTML, and • transmit the HTML or XML object to the browser for display.

Nowhere does the Lo publication mention reference to **hyperlinks** in an HTML file. Instead, the HTML input form of Lo is used to supply data to an API that essentially converts from HTML to ERP format. While it is possible that Lo *could* use hyperlinking to access the API interface, there is no teaching or suggestion to do so.

Basically, the Lo system and the system of the claimed invention have entirely different objectives and concern different problems. The claimed invention provides a simple way to directly manage network devices through a Web browser, without additionally installing a management module in the work station to keep track of IP addresses, by using the "hyperlink" feature of the HTTP protocol in which routing information is obtained from network nodes using IP packets, and the operator simply needs to "click" on a displayed hyperlink in order to access
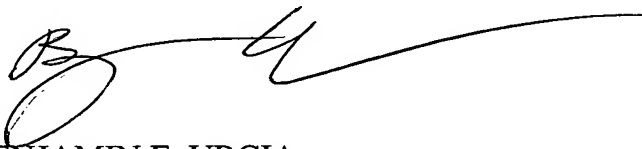
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a corresponding web page. The Lo publication, on the other hand, is directed to a specific interface (API) enabling communications with an ERP device over the web, with no suggestion of the claimed hyperlinking.

Consequently, it is respectfully submitted that the Lo publication does not "anticipate" the claimed invention, and withdrawal of the rejection of claims 1-10 under 35 USC §102(e) is respectfully requested.

Having thus overcome each of the rejections made in the Official Action, expedited passage of the application to issue is requested.

Respectfully submitted,

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Date: July 12, 2005

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